

Newark

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March 3, 2021

Via Electronic filing

Hon. Leda D. Wettre, U.S.M.J.
MLK Federal Building and Courthouse
50 Walnut Street
Newark, NJ 07102

Re: CITY OF NEWARK VS CITY OF NEW YORK ET AL
Docket No. 2:19-cv-20931

Status letter

Dear Judge Wettre:

If amenable to the Court, the Plaintiff City of Newark will respond to the Intervenor's Complaint by **Monday, March 8, 2021**. We will not seek, or expect, any further extensions.

The City timely complied with the Court's Order in serving discovery demands on NYC (February 17). The City timely complied with the Court's Order when it responded to NYC's request to file a Motion to Dismiss on the Pleadings (February 24). I am aware of the deadlines and it is not in my nature to miss them.

I was hoping to have filed the response by now. However, despite my best intentions and efforts, I simply need a few more days with respect to the Intervenor's Complaint. I apologize to Your Honor and all counsel. Despite working each and every day for all of February (the only days I did not work were Sunday February 14 and Saturday, February 20), I have been inundated with emergent matters. That is no excuse, of course, but the Law Department has limited resources and many of the staff are out on leave because of the virus or are quarantined because of exposure and the demands are innumerable and overwhelming. I am not working remotely, but am in my office each and every day.

Respectfully, I see the light at the end of the tunnel and I just need a few more days. We will file our papers by Monday, March 8, 2021 and I hope that the Court will grant this request.

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Respectfully,

Kenyatta Stewart
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By: /s/ Gary S. Lipshutz
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/GSL